



U.S. Department of Justice

United States Attorney
Southern District of New York

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

August 18, 2019

VIA ECF AND EMAIL

The Honorable Alison J. Nathan
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

**Re: United States v. Steven Rawlins,
15 Cr. 377/19 Cv. 0135 (AJN)**

Dear Judge Nathan:

The Government writes respectfully to request an adjournment until September 19, 2019 of its August 19, 2019 deadline to respond to the motion filed by defendant Steven Rawlins ("Rawlins") pursuant to Title 28, United States Code, Section 2255. On June 27, 2019, prior defense counsel Richard Braun, Esq., filed an affidavit in this matter addressing certain of the claims made in Rawlins's motion. On July 28, 2019, the Government requested a three-week adjournment of its filing in order to, among other things, speak with representatives of the victim companies, Prime Health Service, Inc. and Core Choice, Inc. concerning certain claims contained in Rawlins's motion. The Court granted that adjournment.

Since the Court's granting of that adjournment, the Government has conducted further factual inquiry relevant to its responsive filing. For example, the Government has engaged in discussions with a representative of Core Choice, Inc., concerning Rawlins's assertion that he assigned his purported shares in Core Choice, Inc. to Braun shortly prior to trial. In those discussions, the Government learned of additional, potentially relevant materials not referenced in Rawlins's motion or Braun's affidavit that are subject to a confidentiality agreement between Braun and Core Choice, Inc. Accordingly, the Government intends to engage in further discussions with the company and with Braun concerning a possible waiver of this confidentiality agreement. To the extent the Government obtains these materials, it is possible that they will inform the Government's position in response to Rawlins's motion. Because the Government requires additional time to complete these discussions, and because Rawlins's motion and Braun's affidavit raise numerous claims that require detailed analysis and review of the trial record and other documents, the Government respectfully requests until September 19, 2019 to file its response. The Government believes that this additional time will permit it to file a response that will more comprehensively address and analyze the relevant factual and legal issues for the Court, thus permitting it to efficiently resolve the defendant's motion.

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Thank you for your consideration of this request.

Respectfully submitted,

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